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October 5, 2017

File No. 07261-0014

Via E-file

Honorable Joel Schneider, U.S.M.J.
Mitchell H. Cohen Bldg. and U.S. Courthouse
4th and Cooper Streets, Courtroom 3C
Camden, NJ 08101

Re: D.V., et al v. Pennsauken School District Board of Education, et al
1:12-cv-07646-JEI-JS

Dear Judge Schneider:

As you are aware, this office represents the Pennsauken School District and Marty DeLape (hereinafter "Defendants") in the above matter. Defendants are in receipt of the Court's Orders granting Plaintiff until October 12, 2017 to file a sur-reply to Defendants' Motion for Summary Judgment and to file an "omnibus sur-reply" to both Defendants' and Lavell and Taylor's Motions for Summary Judgment. These Orders do not contemplate a further reply from either Defendants or Lavell and Taylor which would, in regards to Defendants, deprive the opportunity to file a reply to Plaintiff's opposition to the Motion for Summary Judgment. Therefore, Defendants request until October 19, 2017 to issue a further reply to Plaintiffs' submission on October 12, 2017. Counsel for Lavell and Taylor joins in this request.

Finally, with the latest briefing schedule, the parties will likely not have the disposition of the Motions for Summary Judgment until after, or immediately before, the Final Pre-Trial Conference scheduled for October 19, 2017. Without that decision or in a limited timeframe, it will likely not be possible to finalize the Final Pre-Trial Order. Accordingly, Defendants and counsel for Lavell and Taylor respectfully request guidance from the Court as to what should be completed by the parties prior to the Final Pre-Trial Conference scheduled for October 19, 2017.

Respectfully submitted,

/s/ BRETT E.J.GORMAN

BRETT E.J. GORMAN

BEJG/dbm

cc: Matthew Weisberg, Esquire - via E-Filing
Richard Goldstein, Esquire - via E-Filing

COUNSEL WHEN IT MATTERS.SM

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